

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Joint Administration Pending)

Ref. Nos. 3, 9, 25, 28, 45, 47, 49 & 50

NOTICE OF REVISED PROPOSED ORDERS

PLEASE TAKE NOTICE that on November 11, 2022 and November 14, 2022, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that on November 14, 2022, the Debtors filed the *Motion of Debtors for Entry of an Order (I) Authorizing Joint Administration of the Debtors’ Chapter 11 Cases and (ii) Granting Certain Related Relief* [D.I. 3] (the “Joint Administration Motion”). The Debtors have revised the proposed form of order to the Joint Administration Motion (the “Revised Joint Administration Order”), a copy of which is attached hereto as **Exhibit A-1**. A copy of the Revised Joint Administration Order compared against the proposed order attached to the Joint Administration Motion is attached hereto as **Exhibit A-2**.

PLEASE TAKE FURTHER NOTICE that on November 14, 2022, the Debtors filed the *Motion of Debtors for Entry of an Order (I) Modifying Certain Creditor List Requirements; (II) Authorizing the Debtors to Serve Certain Parties by E-Mail; and (III) Granting Related Relief* [D.I. 9] (the “Rule 1007 Motion”). The Debtors have revised the proposed form of interim order to the Rule 1007 Motion (the “Revised Rule 1007 Interim Order”), a copy of which is attached hereto as **Exhibit B-1**. A copy of the Revised Rule 1007 Interim Order compared against the proposed order attached to the Rule 1007 Motion is attached hereto as **Exhibit B-2**.

PLEASE TAKE FURTHER NOTICE that on November 17, 2022, the Debtors filed the *Motion of Debtors for Entry of an Order Enforcing Sections 362, 365(e)(1), 525 and 541 of the Bankruptcy Code* [D.I. 25] (the “Worldwide Stay Motion”). The Debtors have revised the proposed form of order to the Worldwide Stay Motion (the “Revised Worldwide Stay Order”), a copy of which is attached hereto as **Exhibit C-1**. A copy of the Revised Worldwide Stay Order

¹ The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

compared against the proposed order attached to the Worldwide Stay Motion is attached hereto as **Exhibit C-2**.

PLEASE TAKE FURTHER NOTICE that on November 17, 2022, the Debtors filed the *Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Kroll Restructuring Administration LLC as Claims and Noticing Agent Effective Nunc Pro Tunc to the Petition Date* [D.I. 28] (the "Kroll Retention Application"). The Debtors have revised the proposed form of order to the Kroll Retention Application (the "Revised Kroll Retention Order"), a copy of which is attached hereto as **Exhibit D-1**. A copy of the Revised Kroll Retention Order compared against the proposed order attached to the Kroll Retention Application is attached hereto as **Exhibit D-2**.

PLEASE TAKE FURTHER NOTICE that on November 19, 2022, the Debtors filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals and (III) Granting Certain Related Relief* [D.I. 45] (the "Creditor Matrix Motion"). The Debtors have revised the proposed form of interim order to the Creditor Matrix Motion (the "Revised Interim Creditor Matrix Order"), a copy of which is attached hereto as **Exhibit E-1**. A copy of the Revised Interim Creditor Matrix Order compared against the proposed order attached to the Creditor Matrix Motion is attached hereto as **Exhibit E-2**.

PLEASE TAKE FURTHER NOTICE that on November 19, 2022, the Debtors filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Operate A Postpetition Cash Management System, (B) Maintain Existing Business Forms and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(B) and (III) Granting Certain Related Relief* [D.I. 47] (the "Cash Management Motion"). The Debtors have revised the proposed form of interim order to the Cash Management Motion (the "Revised Interim Cash Management Order"), a copy of which is attached hereto as **Exhibit F-1**. A copy of the Revised Interim Cash Management Order compared against the proposed order attached to the Cash Management Motion is attached hereto as **Exhibit F-2**.

PLEASE TAKE FURTHER NOTICE that on November 19, 2022, the Debtors filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Notice and Objection Procedures for Transfers of Equity Securities and Claims of Worthless Stock Deductions and (II) Granting Certain Related Relief* [D.I. 49] (the "NOL Motion"). The Debtors have revised the proposed form of interim order to the NOL Motion (the "Revised Interim NOL Order"), a copy of which is attached hereto as **Exhibit G-1**. A copy of the Revised Interim NOL Order compared against the proposed order attached to the NOL Motion is attached hereto as **Exhibit G-2**.

PLEASE TAKE FURTHER NOTICE that on November 19, 2022, the Debtors filed the *Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Compensation and Benefits and (B) Continue Compensation and Benefits and (II) Granting Certain Related Relief* [D.I. 50] (the "Wages Motion"). The Debtors have revised the proposed form of interim order to the Wages Motion (the "Revised Interim Wages Order"), a

copy of which is attached hereto as **Exhibit H-1**. A copy of the Revised Interim Wages Order compared against the proposed order attached to the Wages Motion is attached hereto as **Exhibit H-2**.

PLEASE TAKE FURTHER NOTICE that copies of all above mentioned motions may be obtained from the Court's website, <https://ecf.deb.uscourts.gov/>, for a nominal fee, or obtained free of charge by accessing the website of the Debtors' claims and noticing agent, <https://cases.ra.kroll.com/FTX>.

Dated: November 22, 2022
Wilmington, Delaware

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